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Attorney for Adversary Proceeding Defendants
Leslie Klein, an individual; The Second Amended Klein Living Trust, a trust;
The Marital Deduction Trust of Erika Klein, a trust; The Survivor's Trust of
Leslie Klein, a trust; and Barbara Klein, an individual

UNITED STATES BANKRUPTCY COURT

CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION

In re:

LESLIE KLEIN,

Debtor.

Case No.: 2:23-bk-10990-NB

Chapter 11

**OPPOSITION TO CHAPTER 11
TRUSTEE'S MOTION SET FOR APRIL 8,
2025 TO ENFORCE ORDER TO
RESTORE POSSESSION OF THE
PROPERTY LOCATED AT 322 N. JUNE
ST., LOS ANGELES, CALIFORNIA**

Date: April 8, 2025
Time: 2:00 PM
Place: Courtroom 1545
255 East Temple Street
Los Angeles, California 90012

**TO THE HONORABLE NEIL W. BASON, JUDGE OF THE UNITED
STATES BANKRUPTCY COURT, OFFICE OF THE UNITED STATES**

**OPPOSITION TO CHAPTER 11 TRUSTEE'S MOTION SET FOR APRIL 8, 2025 TO ENFORCE ORDER
TO RESTORE POSSESSION OF THE PROPERTY LOCATED AT 322 N. JUNE ST., LOS ANGELES,
CALIFORNIA**

**TRUSTEE, CHAPTER 11 TRUSTEE, AND TO ALL PARTIES IN
INTEREST:**

PLEASE TAKE NOTICE that Adversary Proceeding Defendants (“AP Defendants”), Leslie Klein, an individual; The Second Amended Klein Living Trust, a trust; The Marital Deduction Trust of Erika Klein, a trust; The Survivor’s Trust of Leslie Klein, a trust; and Barbara Klein, an individual, hereby files this opposition to the Chapter 11 Trustee’s Motion to Enforce Order to Restore Possession of the Property Located at 322 N. June St., Los Angeles, California to the Trustee, Compelling Debtor to Vacate the Property, Authorizing and Directing the United States Marshals Service to Turnover Possession of the Property, and Authorizing the Trustee to Remove Any Remaining Personal Property (“Motion to Enforce June Street Turnover”), respectfully represent as follows:

I. INTRODUCTION

Plaintiff Trustee seeks to remove Debtor and his wife, Barbara Klein including if necessary, to order the U.S. Marshals to assist in such eviction based on the Order in the Motion for Summary Judgment regarding 322 N. June Street, Los Angeles, California (“the June Street Property”) the residence of Debtor and his wife, co-defendant Barbara Klein, also a resident but not a Debtor.

**OPPOSITION TO CHAPTER 11 TRUSTEE’S MOTION SET FOR APRIL 8, 2025 TO ENFORCE ORDER
TO RESTORE POSSESSION OF THE PROPERTY LOCATED AT 322 N. JUNE ST., LOS ANGELES,
CALIFORNIA**

1 The Order is on appeal, but it is clear on its face that Trustee does not
2 have an insurable title (see *infra*).
3

4 Plaintiff previously sought an order that would include enforcement by
5 the U.S. Marshal. The transcript of the hearing is in Exhibit C of Plaintiff's
6 moving papers beginning at Page 101, a copy of which is attached as
7 Exhibit 1. The court did not grant enforcement by the U.S. Marshal.
8

9 Beginning at Page 112, the Court discusses the cases on which Plaintiff
10 relied to justify the appointment of the Marshal (*In re Kerlo*, 311 B.R. 256,
11 2004 Bankr. LEXIS 354) and (*Toledano v. Kittay* (*In re Toledano*), 299 B.R.
12 284, 2003 Bankr. LEXIS 1173) and at Page 115 held that any such
13 appointment would be premature but after 30 days the Trustee could seek
14 any remedy he deemed appropriate. Beginning at Page 119, the Court
15 made it clear that she was not entitling Plaintiff to appointment based on
16 the passage of 30 days and Plaintiff would need to show appropriate cause
17 in a new motion. No showing is made in the present motion in the present
18 motion other than passage of 30 days including nothing addressing the fact
19 that he does not have insurable title or the other issues raised by
20 Defendants.
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1 Plaintiff also has on file an application to employ Coldwell Banker to sell
2 the property which the Court has set for hearing on May 20, 2025 which
3 involves the same issues.
4

5 Defendants have proposed to Plaintiff that the Marital Deduction Trust
6 and Credit Trust are willing to pay \$10,000 a month to Mr. Sharp, and to
7 pay all the utility bills and all the repair and maintenance bills until the
8 appeals court decides if the bankruptcy estate owns the house or the
9 Marital Deduction Trust or Credit Trust owns the house. The trusts are also
10 prepared to go to mediation and to discuss other types of proposals.
11
12

13 Defendants have pointed out that continued presence of Defendants
14 Leslie Klein and Barbara Klein in June Street Property is in the best interest
15 of the estate to avoid vacant property in hands of the estate while further
16 proceedings are had to (if successful by Plaintiff) create clear and insurable
17 title as set forth below. Additionally, the Court has authority and the
18 responsibility to not unnecessarily burden third parties in connection to
19 Section 344(a)(3). (See II d p 5, infra)
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OPPOSITION TO CHAPTER 11 TRUSTEE'S MOTION SET FOR APRIL 8, 2025 TO ENFORCE ORDER
TO RESTORE POSSESSION OF THE PROPERTY LOCATED AT 322 N. JUNE ST., LOS ANGELES,
CALIFORNIA

1 **II. ARGUMENT**

2 **a. Facts**

3
4 This Court awarded Plaintiff judgment as he requested and the title
5 issues raised are based on Plaintiff's First Amended Complaint, the Motion
6 for Summary Judgment, and the Order prepared by Plaintiff.
7

8 **b. Failure to Join Necessary Parties**

9 This Second Amended Klein Living Trust has 5 named parties, the four
10 children of the late Erika Klein and Debtor Leslie Klein, and the Credit
11 Trust, who, for reasons never explained, were never joined as parties to the
12 Quiet Title litigation.
13

14
15 CCP § 762.010 provides *"The plaintiff shall name as defendants in the*
16 *action the persons having adverse claims to the title of the plaintiff against*
17 *which a determination is sought"*. The Code Commissioner states, *"Section*
18 *762.010 states the rule for the joinder of known adverse claimants; Failure*
19 *to join these persons will result in a judgment that does not bind them"*.
20
21

22 **c. Naming of "trusts" as if they had juridical existence**

23 The First Amended Complaint and the Order (both prepared by
24 Plaintiff) name as parties "The Second Amended Klein Living Trust", "The
25 Marital Deduction Trust of Erika Klein" and "The Survivor's Trust of Leslie
26 Klein".
27
28

1 A "trust itself cannot sue or be sued". *Presta v. Tepper* (2009) 179
2 CA4th 4th 909 cited in *Portico Management Group v. Harrison*, 202 CA4th
3 464, 473 (2011).
4

5 The California courts have consistently held that issues related to
6 standing, which affect the jurisdiction of the court, are not waived by the
7 failure to raise them at trial and can be addressed on appeal. *Cummings v.*
8 *Stanley*, 177 Cal. App. 4th 493, *In re B.S.*, 65 Cal. App. 5th 888.
9
10

11 It is in the best interest of the Estate that Defendants Barbara Klein
12 and Leslie Klein remain in possession of the June Street Property, with the
13 Marital Deduction Trust and Credit Trust paying maintenance utilities and
14 repairs and by their presence deterring occupancy by homeless people as
15 opposed to leaving it vacant.
16
17

18 While it is not unique to this estate, we have seen situations where
19 comparable properties left vacant attract homeless people who do
20 significant damage thereby reducing the value of the asset for the estate.
21

22 **d. The Court should review the trustee's proposed exercise of**
23 **powers so as not to unnecessarily harm third parties in the**
24 **exercise of Section 344(a)(3)**
25

26 The Trustee's proposed action affects not only the Debtor but others,
27 not least his wife, Defendant Barbara Klein. It is clear that the Trustee
28

1 would not be in a position to sell immediately and so, would have a vacant
2 property on his hands. There is an offer on the table as well as an
3 expression of willingness to mediate. Under the circumstances there is no
4 reason to evict from her residence a woman during a period when it is of no
5 value to the Trustee.
6

7
8 The following is from a search of Lexis Nexis, but counsel has verified
9 the authority cited:
10

11 *"Yes, a trustee should use discretion to avoid unnecessarily harming third*
12 *parties when exercising powers under Section 344(a)(3). The bankruptcy*
13 *court has the discretion to authorize and enforce actions requested by the*
14 *trustee, such as compelling a debtor to sign a consent directive, which is*
15 *part of the trustee's investigatory duties. Rigby v. Mastro (In re Mastro), 585*
16 *B.R. 587. The trustee's investigatory powers are broad and include the*
17 *authority to require the production of documents and other information*
18 *necessary for the administration of the estate. However, the exercise of*
19 *these powers should be balanced with the potential impact on third parties,*
20 *ensuring that actions taken are necessary and proportionate to the*
21 *objectives of the bankruptcy process. This approach aligns with the general*
22 *principle that bankruptcy proceedings should be conducted in a manner*
23 *that is fair and equitable to all parties involved, including third parties who*
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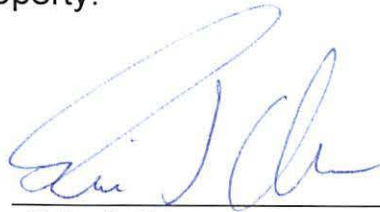
OPPOSITION TO CHAPTER 11 TRUSTEE'S MOTION SET FOR APRIL 8, 2025 TO ENFORCE ORDER
TO RESTORE POSSESSION OF THE PROPERTY LOCATED AT 322 N. JUNE ST., LOS ANGELES,
CALIFORNIA

1 may be affected by the trustee's actions. Rigby v. Mastro (In re Mastro),
2 585 B.R. 587, Miller v. Mathis (In re Mathis), 548 B.R. 465."
3

4 **III. CONCLUSION**

5 For the foregoing reasons, the AP Defendants respectfully state that
6 there is no legitimate basis for evicting Defendants, that it is in the best
7 interest of the Estate that the property remains occupied by Mrs. Klein as
8 well as the Debtor when Plaintiff does not have title to convey, order parties
9 to meet and confer, regarding the property.
10
11

12 Dated: April 4, 2025

13
14 

15 Eric J. Olson
16 Attorney for Adversary Proceeding
17 Defendants
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DECLARATION OF ERIC J. OLSON

I, Eric J. Olson, states:

1. I am an attorney licensed to practice law in the State of California. I am counsel of record for AP Defendants in this action. The statements herein are based upon my personal knowledge and my review of the records within my office. If called as a witness, I could and would competently testify hereto.
2. I make this declaration in support of the Adversary Proceeding Defendants' Opposition to Chapter 11 Trustee's Motion to Enforce June Street Turnover.
3. Attached hereto as Exhibit 1 is a true and correct copy of the transcript of the hearing in Exhibit C of Plaintiff's moving papers beginning at Page 101.

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OPPOSITION TO CHAPTER 11 TRUSTEE'S MOTION SET FOR APRIL 8, 2025 TO ENFORCE ORDER
TO RESTORE POSSESSION OF THE PROPERTY LOCATED AT 322 N. JUNE ST., LOS ANGELES,
CALIFORNIA

1 4. Attached hereto as Exhibit 2 is a true and correct copy of the
2 Declaration of Leslie Klein attached to the Opposition to Application
3 to Employ Coldwell Banker (without exhibits).
4

5 I declare under penalty of perjury under the laws of the United States
6 that the foregoing is true and correct. Executed this 4th day of April 2025,
7 at Los Angeles, California.
8

9 Dated: April 4, 2025
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12 Eric J. Olson
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EXHIBIT 1

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES

--oOo--

In Re:)
) Case No. 2:23-bk-10990-SK
)
LESLIE KLEIN,) Chapter 11
)
Debtor.) Los Angeles, California
) Wednesday, 9:00 A.M.
-----X February 12, 2025
SHARP,)
)
Plaintiff,)
)
v.) Adv. No. 2:24-ap-01140-SK
)
KLEIN,)
)
Defendant.)
-----X

HEARING RE: CHAPTER 11
TRUSTEE'S MOTION FOR ORDER
PURSUANT TO BANKRUPTCY RULE
9019 APPROVING SETTLEMENT
WITH MUTUAL RELEASES BETWEEN
THE TRUSTEE AND FRANKLIN H.
MENLO AND JEFFREY WINTER, CO-
TRUSTEES OF THE FRANKLIN
MENLO IRREVOCABLE TRUST
ESTABLISHED MARCH 1, 1983 AND
GRANTING RELIEF FROM STAY

MOTION FROM RELIEF FROM STAY
FRANK H. MENLO V. DEBTOR ECF
[NON-BK FORUM] PAUL YOUNG,
ATTY/MOVANT

1 Proceedings produced by electronic sound recording;
2 transcript produced by transcription service.
3 MOTION FROM RELIEF FROM STAY
4 JEFFREY WINTER, CO-TRUSTEE OF
5 THE FRANKLIN MENLO
6 IRREVOCABLE TRUST ESTABLISHED
7 MARCH 1, 1983 V. DEBTOR ECF
8 [NON-BK FORUM] ALEX
9 WEINGARTEN, ATTY/MOVANT
10
11 HEARING RE: CHAPTER 11
12 TRUSTEE'S MOTION FOR ORDER
13 APPROVING SETTLEMENT BETWEEN
14 THE TRUSTEE AND A. GESTETNER
15 FAMILY TRUST AND GESTETNER
16 CHARITABLE REMAINDER UNITRUST
17 PURSUANT TO BANKRUPTCY
18 RULE 9019
19
20 HEARING RE: MOTION OF
21 CHAPTER 11 TRUSTEE FOR ORDER
22 APPROVING SETTLEMENT BETWEEN
23 TRUSTEE AND A. GESTETNER
24 FAMILY TRUST AND GESTETNER
25 CHARITABLE REMAINDER UNITRUST
PURSUANT TO BANKRUPTCY RULE
9019

HEARING RE: MOTION FOR ORDER
APPROVING SALE OF ESTATE'S
INTEREST IN SUITE 1323 OF THE
LEONARDO PLAZA HOTEL, HA-RAV
AVIDA ST. 1, JERUSALEM,
9426801, ISRAEL

HEARING RE: CHAPTER 11
TRUSTEE FOR ORDER (1)
RESTORING POSSESSION OF THE
PROPERTY LOCATED AT 322 N.
JUNE ST., LOS ANGELES,
CALIFORNIA TO THE TRUSTEE AND
COMPELLING DEBTOR TO VACATE
THE PROPERTY;

1 AND (2) DIRECTING AND
2 AUTHORIZING THE UNITED STATES
3 MARSHAL SERVICE, OR ANY OTHER
4 LAW ENFORCEMENT AGENCY WITH
5 JURISDICTION, TO ENFORCE THE
6 ORDER OF THE COURT TO RESTORE
7 POSSESSION OF THE PROPERTY TO
8 THE TRUSTEE

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TRANSCRIPT OF PROCEEDINGS
BEFORE THE HONORABLE SANDRA KLEIN
UNITED STATES BANKRUPTCY JUDGE

APPEARANCES:

For the Chapter 11 Trustee Bradley Sharp: JEFFREY W. DULBERG, ESQ.
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For the Chapter 11 Co-Trustee Frank Menlo: KEVIN C. RONK, ESQ.
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5 Chapter 11 Trustee: BRADLEY D. SHARP, Trustee
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6 Suite 4100
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7
8 For the Marital ERIC J. OLSON, ESQ.
Deduction Trust and EJOlsonLAW
301 East Colorado Boulevard
9 Suite #520
Pasadena, California 91101
10
11 Court Recorder: Wanda Toliver
U.S. Bankruptcy Court
Central District of California
12 Edward R. Roybal Federal Building
and Courthouse
13 255 East Temple Street, Room #1639
Los Angeles, California 90012
14 (855) 460-9641
15 Court Transcriptionist: Ruth Ann Hager, C.E.T.**D-641
Ben Hyatt Certified Deposition
16 Reporters
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18 Encino, California 91316
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20
21
22
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1	<u>INDEX</u>			
2				<u>Page</u>
3				
4	<u>WITNESSES:</u>	<u>Direct</u>	<u>Cross</u>	<u>Redirect</u> <u>Recross</u>
5	FREDDIE MORSEL			
6	By Ms. Gans	15		
7	By Mr. Procel		26	
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Page

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1 LOS ANGELES, CALIFORNIA, WEDNESDAY, FEBRUARY 12, 2025

2 10:26 A.M.

3 --oOo--

4 THE CLERK: Please come to order. This Court is
5 again in session.

6 THE COURT: Good morning again. We are back on
7 the record and starting with the Klein matters.

8 Matter #15.00 is the trustee's motion to approve
9 a settlement with Frank Menlo and Jeffrey Winter, co-
10 trustees, of the Menlo Trust.

11 Who is appearing on this matter? I see
12 Mr. Dulberg, you have your video on.

13 MR. DULBERG: I do, Your Honor. It will be me
14 for the Pachulski Stang firm. I'll enter my appearance.
15 Jeffrey Dulberg, Pachulski Stang Ziehl & Jones, on behalf
16 of the Chapter 11 Trustee, Bradley Sharp.

17 THE COURT: Good morning.

18 Mr. -- it says Mr. Goodrich, but I don't believe
19 you're Mr. Goodrich.

20 MR. GOODRICH: Good morning, Your Honor. I am
21 Mr. Goodrich. I'm appearing for Mr. Weingarten, who is
22 counsel of record for Jeffrey Winter.

23 THE COURT: Okay. I was thinking of a different
24 Mr. Goodrich. I -- I apologize for that.

25 Mr. Ronk?

Page

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1 MR. RONK: Good morning, Your Honor. Kevin Ronk
2 appearing on behalf of Frank Menlo, co-trustee of the
3 Franklin Menlo irrevocable trust.

4 THE COURT: Good morning.

5 Mr. Olson, are you appearing on this matter,
6 which is the settlement of the Menlo and Winter relief from
7 stays, as well as -- I believe that's it.

8 MR. OLSON: No.

9 THE COURT: Okay. Thank you.

10 Is anyone else appearing on this matter?

11 (No response.)

12 THE COURT: Okay. All right. So there were no
13 timely oppositions filed. The trustee is seeking approval
14 of a settlement with Mr. Winter and Menlo on behalf of the
15 Menlo Trust. A summary of the settlement, the Menlo's
16 proof of claim for more than \$55 million will be allowed as
17 follows.

18 They'll have a general unsecured claim of
19 \$19,225,065 million, a subordinated, unsecured claim of
20 \$11,176,758 and all other amounts will be disallowed.
21 Menlo will pay \$300,000 to the estate pending approval of
22 the settlement and the settlement is a full and final
23 revolute -- resolution, excuse me, of the Menlo relief from
24 stay, which is docket 65, and the Winter relief from stay,
25 docket 254, and Menlo will have relief to proceed to

Page

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1 judgment on all of the state court probation -- probate
2 matters, but they'll not be permitted to collect any
3 resulting judgment from the estate assets nor will they be
4 permitted to increase the amount of their allowed claims
5 against the estate as a result of any such judgment.

6 In terms of the issues that the Court considers,
7 those are the A&C Properties issues that are set out by the
8 Ninth Circuit in 784 F.2d 1377, a Ninth Circuit case from
9 1986. Those are the probability of success in litigation,
10 the difficulties, if any, to be encountered in the matter
11 of collection, the complexity of the litigation involved in
12 the expense and convenience and delay necessarily attending
13 it, and the paramount interests of the creditors and a
14 proper deference to their reasonable views.

15 The Court finds that all of those factors weigh
16 in favor of granting the 9019 motion. The settlement
17 reduces the Menlo claim to what Mr. Sharp indicates he
18 would expect the results would be if those claims were
19 litigated. Difficulties in collection, that wasn't a
20 considerable or critical factor in the analysis.
21 Complexity of the litigations, Mr. Sharp indicates that the
22 issues were not complex and the existing documents
23 regarding the Menlo claim establishes that the settlement
24 is appropriate and expensive and further investigation and
25 litigation is not justified in the Trustee's opinion and

Page

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1 the Court agrees.

2 And there is a significant benefit to this
3 settlement. It shaves over \$36 million off the Menlo claim
4 and it generates \$300,000 for the estate. Therefore, the
5 Court approves the settlement.

6 Mr. Dulberg, you're the prevailing party. I'll
7 ask that you upload an order within seven days via LOU.

8 MR. DULBERG: Your Honor, just two comments. One
9 is, this really requires two orders. One is the -- the
10 order approving the 9019 motion, one is the really heavily
11 crafted relief from stay order that was attached as part of
12 the agreement. Your Honor, I see Your Honor's nodding.
13 I'm assuming that Your Honor's okay with executing both
14 orders now in connection with approval at settlement. I
15 know it means a lot to the others on the phone.

16 THE COURT: Absolutely. Yes.

17 MR. DULBERG: Thank you, Your Honor.

18 THE COURT: I appreciate you clarifying,
19 Mr. Dulberg.

20 MR. DULBERG: And then --

21 THE COURT: So --

22 MR. DULBERG: -- and it's very --

23 THE COURT: -- the --

24 MR. DULBERG: Yes, Your Honor?

25 THE COURT: The -- there will be two orders

Page 101

1 in the opposition and Sharp does not address it in the
2 reply. Here, Klein's position is premised on an argument
3 that the Court has already addressed and rejected.
4 Therefore, the Court finds that waiver of the 14-day stay
5 is appropriate.

6 So to summarize, the Court grants the motion and
7 approves the sale of the property in Jerusalem.

8 Mr. Dulberg, you are the prevailing party. I'll
9 ask that you upload an order within seven days via LOU.

10 MR. DULBERG: Thank you, Your Honor. Will do so.

11 THE COURT: Thank you.

12 Now turning to matter number #21.00, which is the
13 Trustee's motion to restore possession of the 322 June
14 Street property to the Trustee.

15 Mr. Lucas, are you arguing this one?

16 MR. DULBERG: You want --

17 MR. LUCAS: Yes, Your Honor.

18 MR. DULBERG: -- Mr. Lucas on this one.

19 THE COURT: Okay.

20 MR. LUCAS: Yes, Your Honor.

21 THE COURT: Okay. Mr. Lucas, it's your motion.

22 Please proceed.

23 MR. LUCAS: Your Honor, I think everything that
24 we have in the motion is set forth in, but I would just
25 like to point out something just sort of the timing here.

Page

102

1 The Trustee filed the complaint in May of 2024.
2 The answer was filed in July of 2024. Discovery was
3 completed at the conclusion of the summer of 2024 and the
4 Trustee filed this motion for summary judgment on the
5 property estate issue in September of 2024.

6 There was an opposition filed in the middle of
7 October, a reply at the end of October. And, Your Honor,
8 there was a hearing before Your Honor on December 18th
9 where Your Honor ruled in favor of the Trustee on all
10 counts in the complaint in the summary judgment motion.

11 And, Your Honor, we filed this motion and now it
12 has been nine months since we have filed the complaint.
13 There are no surprises here, Your Honor, and the Trustee is
14 looking forward to acquire or control possession of the
15 property so that we can make appropriate measures to deal
16 with liquidation or otherwise, Your Honor, for the
17 creditors of the estate.

18 Nothing further, Your Honor, unless you have
19 questions.

20 THE COURT: I don't. Thank you, Mr. Lucas.
21 Mr. Olson?

22 MR. OLSON: Okay. We are not, at this point,
23 seeking to re-argue the results of the motions for summary
24 judgment. It's on appeal. One point is that for reasons
25 never explained in the record, the Trustee did not seek to

Page 103

1 name as a defendant in this quiet title action a named
2 party in the trust. Actually, five named parties in the
3 trust.

4 And so on the face of it, the -- as called out by
5 the co-commissioner in state of California, the judgment is
6 not binding as to those five parties.

7 In my opposition, I raised the point that such
8 title as the Trustee claims to have is uninsurable, which
9 means he's not going to be able to sell it in the
10 foreseeable future, and so he's going -- if he succeeds in
11 removing Mr. Klein and his wife, who incidentally is --
12 although she is a party to the motion for summary
13 judgment is not designated in this motion, he's going to
14 have a vacant property on his hands.

15 It is going to be an expensive proposition to
16 secure this property and maintain it. On the other hand,
17 the Kleins are living there. They can continue to live
18 there. They have indicated a willingness to pay or seems
19 to be paid the bills associated with it and have secured
20 the -- a proposal to pay the Trustee an amount -- the
21 Trustee or to mediator meet and confer about that. The
22 Trustee has not seen fit to talk about any of those things
23 with us.

24 And so at least for -- until the Trustee is in a
25 position to show that he would be able to do something with

Page

104

1 this property, the Court should not grant him possession
2 should it turn out that, in the end, he is able to
3 establish insurable title. The circumstances may be
4 otherwise.

5 But at least for the time being, and I think it
6 is not inappropriate, even though the Court thought the
7 showing was thin, the Court probably noticed on the bill
8 that it had the address of the pharmacy in the hospital in
9 Baltimore where Mister -- where Mr. Klein is, that there's
10 no particular value to the estate at this point to throw
11 them out and then be burdened with this property.

12 It's a -- you know, the Court, as I pointed out
13 in my papers, also has the obligation to do things so that
14 there's not undue burden on people who are not the debtor.
15 And in this case, what we're talking about is to -- they're
16 asking now that Mrs. Klein, who is not mentioned as the
17 subject of this motion, that she should be evicted.
18 Nothing -- I don't know of any -- anything ever in this
19 case that has suggested she's done anything wrong, either
20 in a moral sense or in a creditor's sense.

21 In any event, so we would ask the Court to deny
22 the motion without prejudice should circumstances change in
23 the future so that if the Trustee can show that he's got
24 insurable title, he can actually do something with the
25 property and if, by that time, they -- the case has not

Page 105

1 been reversed on appeal, the Court can deal with it at that
2 time.

3 Your Honor, I --

4 THE COURT: I muted myself.

5 MR. OLSON: Oh, I'm --

6 THE COURT: Mister --

7 MR. OLSON: -- sorry.

8 THE COURT: Mr. Lucas, is there anything you'd
9 like to address? Please make it brief. I still have
10 another matter and then I have meetings --

11 MR. LUCAS: I'll be very --

12 THE COURT: -- this afternoon.

13 MR. LUCAS: -- very, very brief.

14 Your Honor, in the debtor's schedules, he said
15 that himself and the MDT own the house and in the answer to
16 the complaint, he said the MDT owned the entire house, and
17 now they're saying the creditor trust owns the house. It's
18 just not credible. Whether the property is uninsurable,
19 that's the Trustee's problem. The property's vacant and
20 it's a burdensome issue. That's the Trustee's problem.

21 And, Your Honor, the debtor wants to pay \$10,000
22 a month with money from the MDT, which is property of the
23 estate, which is just mind-boggling, Your Honor. I don't
24 know what else to say. I apologize for my colloquial
25 language, but I don't know what else to say. But, Your

Page 106

1 Honor, we request approval of the motion. Thank you.

2 THE COURT: Thank you.

3 All right. So before the Court is Mr. Sharp, the
4 Chapter 11 Trustee's motion for order restoring possession
5 of the property on June Street compelling debtor to vacate
6 and directing and authorizing the U.S. Marshals to enforce
7 the order.

8 The debtor filed an opposition and the Trustee
9 filed a reply. Again, Klein filed a voluntary Chapter 11
10 case a couple of years ago and a few months later, Sharp
11 was appointed.

12 In April of 2023, Klein filed Schedule A/B in
13 which he indicated he had a 50 percent ownership in the
14 property and the other 50 percent was held by his deceased
15 wife's irrevocable trust. On 12/12, Klein filed an amended
16 Schedule A/B and represented he had a life estate in the
17 property.

18 On May 23, '24, Sharp filed an adversary
19 proceeding against Klein. Klein filed an answer indicating
20 that he didn't have an interest in the property because his
21 50 percent interest was transferred to his deceased wife's
22 marital trust. The answer also provided that the MDT and
23 the credit trust in Klein's current wife, Barbara
24 (phonetic), held all the interests in the property.

25 As Mr. Lucas mentioned, he filed a motion for

Page 107

1 summary judgment. There was an opposition and reply. On
2 12/18, the Court held a hearing and after thoroughly
3 analyzing both Sharp's and Klein's arguments and the
4 evidence presented by both sides, the Court granted the MSJ
5 on quieted title in favor of Sharp finding that the entire
6 property was property of Klein's estate and there was no
7 evidence that either the MDT or CT had been created, let
8 alone funded.

9 The Court also found that even if the property
10 had been transferred to the MDT or CT and, again, there was
11 no evidence that it had been, the -- because Klein was the
12 settler, the trustee, and the beneficiary of the living
13 trust, and the trustee and beneficiary of the MDT and CT,
14 the spendthrift provision of the living trust was invalid
15 and the property was property of the estate.

16 Finally, the Court held that Sharp could avoid
17 any purported interest Barbara had in the property because
18 Sharp had no constructive notice that Barbara or anyone
19 else had any interest in the property. On 12/20/2024, the
20 Court entered an order granting the MSJ.

21 Legal standard, 11 U.S.C. 105, provides the Court
22 may issue any order process of judgment that is necessary
23 or appropriate to carry out the provisions of this title.
24 Section 104 permits a bankruptcy court to issue any order
25 or process or judgment that is necessary or appropriate to



Page 108

1 carry out the provisions of Title 11. That's a Supreme
2 Court case from 1990.

3 The power granted to bankruptcy courts under 105
4 is not limitless. That's *Law v. Siegal*. And 105 provides
5 bankruptcy courts with the power to exercise equity in
6 carrying out provisions of the Code rather than to further
7 the purposes of the Code generally or, otherwise, due the
8 right thing.

9 11 U.S.C. 542(a) provides an entity in
10 possession, custody or control. During the case of
11 property, the trustee may use, sell, or lease under 363
12 shall deliver to the trustee such property or the value of
13 such property, unless the property is of inconsequential
14 value or benefit to the estate.

15 The Trustee has the burden of proof under 542 and
16 must demonstrate by a preponderance of the evidence that
17 the property is one in the possession, custody, or control
18 of a third party, it's property of the estate and of a type
19 that trustee can use, sell, or lease under 363.

20 Analysis. Although generally an adversary
21 proceeding is required to recover money or property, FRBP
22 7001 contains an exception for a trustee seeking to compel
23 a debtor to turn over property to the trustee. Therefore,
24 the Court finds that the motion is procedurally proper.

25 In terms of the first element, possession,

Page 109

1 custody or control of a non-custodial third party, Sharp
2 argues Klein has failed to cooperate with his request to
3 turnover control and possession of the property.

4 Klein responds that to avoid problems with vacant
5 properties, his and Barbara's presence at the property in
6 the best interests of the estate. Klein highlights that
7 during the MSJ hearing, the Court declined to enter an
8 eviction order and he requests that the Court, likewise, do
9 so now and grant a stay.

10 Sharp replies that Klein's request for a stay
11 must be denied. He argues that a request for stay must be
12 made by separate motion and on notice to the proper
13 parties. Additionally, Sharp asserts that a request for a
14 stay must also be supported by evidence and satisfy all of
15 the factors required for granting a stay, which hasn't
16 occurred here.

17 The Court finds that here there is no dispute
18 that Klein is in possession of the property and this
19 element is met. In terms of property of the estate, Sharp
20 asserts the property is an asset of the estate. Klein does
21 not address this element or deny that the property is
22 property of the estate.

23 During the 12/18 hearing on Sharp's MSJ, the
24 Court held that the entire property is property of the
25 estate. Although Klein has appealed that ruling, it does

Page 110

1 not alter the Court's findings and the Court finds this
2 element is met.

3 The third element is a type that the Trustee
4 could use, sell, or lease under 363. Sharp contends that
5 the property is clearly property that he can use, sell, or
6 lease. He alleges he cannot adequately market and sell the
7 property unless he can provide unfettered access to
8 potential purchasers to perform inspections, conduct
9 appraisals and/or waive any other contingencies.

10 Klein asserts that if he is evicted, Sharp would
11 not be in a position to sell the property immediately and
12 would have to have a vacant property on his hands. Sharp
13 does not address this element in the reply. It is
14 undisputed that the element that the property can be used,
15 sold or leased and, therefore, this element is met.

16 Not of inconsequential value or benefit to the
17 estate, Sharp argues that the property is not of
18 inconsequential value and he believes that when the
19 property sells, there will be substantial equity that will
20 benefit creditors and the estate.

21 He asserts that without being in control of the
22 property, it is at risk of loss due to potential negligence
23 or failure to maintain it. Klein responds that when
24 properties are left vacant, they attract people who do
25 significant damage and potentially reduce the value and

Page 111

1 it's in the best interest of the estate that Klein and his
2 wife remain at the property.

3 He offers the following. The MDT and CT will pay
4 \$10,000 per month to Sharp and the utility, repair, and
5 maintenance bills until Klein's appeal of the MSJ is
6 resolved or the parties go to mediation and discuss other
7 types of proposals.

8 Sharp replies that Klein's offer is troubling
9 because he's offering to pay the estate \$10,000 a month and
10 it implies he has financial ability to make such payments
11 and that he is hiding substantial cash from the Trustee,
12 estate, and creditors. Sharp asserts that he is doubtful
13 of Klein's ability to perform such agreement and he is not
14 interested in dealing with Klein or his co-defendants.

15 In Klein's Schedule A/B, he listed the property's
16 value at 4.9 million and in his amended A/B, he indicated
17 that the property's value was five million.

18 Therefore, it's beyond dispute that the property
19 is of significant value and benefit to the estate. It is
20 true that vacant properties can be damaged potentially
21 reducing their value. This possibility, however, does not
22 alter the fact that the property is valuable and its sale
23 can benefit the estate and the sooner Sharp gains
24 possession of the property, the sooner it can be marketed
25 and sold and the sooner the estate will realize a benefit.

Page

112

1 Therefore, the Court finds this factor is met.

2 In terms of the U.S. Marshal Service, Sharp
3 argues that the involvement of the U.S. Marshals is the
4 only way to effectuate enforcement of the court order
5 turning over possession of the property to the Trustee. He
6 requests the Court issue a writ of possession directing the
7 U.S. Marshals to enforce a turnover issue if Klein or any
8 other occupants fail to vacate the property and remove all
9 their personal possessions. In the opposition, Klein
10 doesn't address this request and Sharp doesn't mention it
11 in the reply.

12 Sharp cites *Curlow* (phonetic) and *Toledano*
13 (phonetic) to support his position that involving the U.S.
14 Marshals is necessary to enforce a turnover order. In
15 *Curlow*, Elizabeth Curlow filed a bankruptcy and listed a
16 property in Santa Ana on her schedules valued at \$200,000.
17 Curlow lived at the property, as did numerous tenants.

18 The trustee determined that the fair market value
19 of the property was substantially higher and that
20 administering the property would generate substantial
21 return to the estate. The trustee obtained a turnover
22 order requiring debtor to immediately turnover the property
23 and authorizing the trustee to employ a real estate agent
24 to market and sell the property. That order allowed Curlow
25 and her son to remain on the property until further court

Page 113

1 order.

2 A few months later, the trustee obtained a second
3 turnover order requiring Curlow to turnover the property in
4 vacant condition. That order was to become effective
5 unless Curlow converted her case from 7 to 13. Curlow
6 unsuccessfully attempted to convert her case.

7 About seven months later, the trustee served
8 notice on Curlow and all occupants indicating that all
9 tenancies were terminated and demanding immediate
10 possession. A few days later, the trustee moved for a
11 finding of civil contempt, sanctions and writ of possession
12 and order of ejectment, and requesting that the U.S.
13 Marshals be directed to take all necessary steps to remove
14 occupants from the property.

15 During a hearing, the court found that Curlow was
16 in contempt for willfully violating the turnover orders and
17 that a writ of possession was appropriate under FRCP 69.
18 It requested additional briefing regarding remedies that
19 were available to enforce the turnover orders and whether
20 enforcing the orders would implicate any person's Fourth
21 Amendment rights.

22 After additional briefing, the Court found that
23 FRCP 70 and Section 105 authorized it to issue a writ of
24 execution ordering the Marshals to take possession of the
25 property and to turn it over to the trustee.

Page

114

1 The Court then addressed whether enforcement of
2 the orders implicated the Fourth Amendment. The Court
3 found it did not. The trustee was not a government actor
4 and based on the turnover orders, which were served on
5 Curlow and all tenants and posted on the premises, neither
6 Curlow nor the tenants had a possessory interest in the
7 property and were not legitimately on the premises.

8 In *Toledano*, Andrea Toledano filed a *pro se*
9 Chapter 7 and listed an interest in a rent stabilized New
10 York apartment. In 2003, the trustee sought an order
11 assuming and assigning the apartment to South Park, to
12 let Toledano's landlord for 150,000 and for an order to
13 convey the premises vacant and free and clear of all
14 occupants.

15 After much briefing and litigation, the Court
16 issued a memorandum about three month -- four months later
17 ordering and authorizing the trustee to assume and assign
18 the lease free and clear of all occupants and to directing
19 Toledano and Brian Demurs (phonetic), who lived with
20 Toledano, to vacate the property within ten days of the
21 order's entry.

22 About a week later, the Court entered a judgment
23 directing Toledano and Demurs to vacate the premises within
24 ten days of the order's entry. The judgment provided that
25 if any person occupying the premises did not voluntarily

Page 115

1 vacate, the trustee was authorized to settle an order on
2 three days' notice to Toledano and her counsel directing
3 the U.S. Marshals to effectuate the terms of the assignment
4 by evicting all occupants on the premises.

5 Here, the Trustee correctly summarized the
6 history of the case, but it wasn't until December 20th of
7 2024, less than two months ago, that this Court entered an
8 order granting the MSJ and ruling that the entire property
9 is property of the estate.

10 The evidence before the Court that was filed in
11 support of the Trustee's motion indicates that less than a
12 month ago, on January 15, 2025, Mr. Dulberg, Sharp's
13 counsel, contacted Klein and Klein's counsel requesting
14 that Klein begin the process of turning over the property
15 to Sharp.

16 Two days later, on January 17th, Dulberg sent
17 another email to Klein and Klein's counsel following up.
18 That day, Klein's counsel, Mr. Olson, responded, indicated
19 that he was drafting a response to Dulberg's demand.
20 Dulberg acknowledged receiving Olson's email, but he
21 indicated that the turnover motion had already been filed.

22 Based on the timeline of events in this matter,
23 as compared with Curlow, the Court finds that issuance of a
24 writ of possession at this time and directing the Marshals
25 to enforce the turnover at this time is premature. The

Page

116

1 Court in *Curlow* did not issue a writ of possession or
2 involve the U.S. Marshals until two turnover orders had
3 been issued and ignored and a separate hearing was held
4 addressing whether the Court should issue a writ of
5 possession.

6 Similarly, in *Toledano*, the order and memorandum
7 indicated that the assumption and assignment was to be free
8 and clear of all occupants and *Toledano* and demands --
9 Demurs had ten days to vacate the property. The judgment
10 issued about a week later indicated that if anyone did not
11 voluntarily vacate the premises, as required by the order,
12 the Trustee could seek assistance from the U.S. Marshal to
13 evict all occupants.

14 Here, it is undisputed that the property is
15 Klein's residence and he is to be given a reasonable period
16 of time to comply with the turnover order that the Court
17 will issue at the conclusion of today's hearings. Given
18 the facts in the case, the Court believes that 30 days is a
19 reasonable time for Klein to be given to turnover and
20 vacate the property and for all occupants of the property
21 to vacate. If that does not occur, then the Trustee can
22 seek whatever remedy he deems appropriate at that time.

23 I want to address an argument that Klein raised
24 regarding joinder. In the opposition, Klein reiterated an
25 argument that he made in his motion to join necessary

Page

117

1 parties that he filed in *Sharp v. Klein*, 23-1140, seeking
2 to join his and Erica's four children as defendants in that
3 adversary proceeding and stating, for reasons never
4 explained, the children were never joined as parties to
5 that adversary proceeding.

6 Sharp replied that the necessary parties were
7 sued in that adversary and the Court analyzed Klein's
8 joinder motion in that adversary and denied it. The
9 deadline to appeal the Court's joinder motion ruling has
10 passed and Klein has waived any right to really --
11 relitigate those issues or to litigate those issues before
12 an appellate court.

13 The Court also notes that it addresses -- it
14 addressed Klein's arguments regarding joinder in the MSJ
15 and made explicit detailed findings why joinder of Klein's
16 and Erica's children was unnecessary. On 12/18, this Court
17 held a hearing on Sharp's MSJ filed in the adversary during
18 which the Court reiterated some of its previous rulings
19 regarding why it was unnecessary to join the children.

20 Finally, the Court will briefly mention a few
21 other issues Klein has raised. He cited Section 344(a)(3)
22 and argues the Trustee should not use it or as to harm
23 third parties, in this case to evict Barbara. Section
24 344(a)(3) doesn't exist. Section 344 deals with self-
25 incrimination, immunity for persons required to testify.

Page 118

1 In terms of Klein mentioning that a stay should
2 be issued and he has -- but he didn't explain the basis for
3 that request or provide any analysis of the factors that
4 courts consider when determining whether to issue a stay,
5 to the extent that Klein seeks a stay in the context of his
6 opposition to the turnover motion, it is procedurally and
7 substantively improper.

8 Procedurally, such a request must be brought via
9 a separate notice motion. Substantively, a movant seeking
10 a stay has the burden of proof and other than mentioning a
11 stay in one sentence, Klein does not provide any evidence
12 or argument or legal analysis demonstrating that issuance
13 of a stay would be appropriate.

14 So for the reasons stated, the Court finds that
15 Sharp has met his burden under 542(a) and the turnover
16 motion is granted.

17 Mr. Lucas, is there anything further regarding
18 the turnover motions?

19 MR. LUCAS: Yes, Your Honor. I have a question.

20 THE COURT: Yes.

21 MR. LUCAS: Your Honor, I heard that the form of
22 the order should provide the debtor with 30 days from the
23 entry for him to vacate and the occupants to vacate and to
24 take whatever it is he's going to remove?

25 THE COURT: Correct.

Page

119

1 MR. LUCAS: And I heard that and that's -- I've
2 conferred with Mr. Sharp and he's fine with that.

3 In the event that he doesn't, I assume the order
4 is also going to allow us to seek the assistance of the
5 U.S. Marshal without having to come back to the Court
6 again?

7 THE COURT: At that time, Mr. Lucas, you will
8 have to file a separate motion to lay out --

9 MR. LUCAS: (Indiscernible) --

10 THE COURT: -- that he -- that he did not comply
11 what occurred, that this order was entered I expect today
12 or maybe tomorrow, that it's 30 days, that you attempted to
13 get him out, that you sent reminders, that it didn't occur
14 and, therefore, at that point, you're seeking that the
15 Court enter an order authorizing assistance of the U.S.
16 Marshal and issuance of a writ of possession.

17 I know that was requested in the motion. Again,
18 you relied on *Curlow*. In *Curlow*, there were two turnover
19 orders and it wasn't until there was a separate motion
20 filed and I believe that's the best procedure. And there
21 may also be, at that point, a motion for contempt for the
22 debtor's failure to comply with the turnover order.

23 I know it's cumbersome. I know it takes more
24 estate resources. But due process, which I think in this
25 case as well as all other cases, is very important and we

Page 120

1 need to see what occurs. I've now issued an order ordering
2 the debtor to turnover the property to the Trustee within
3 30 days.

4 Let's see what happens. Maybe he will, maybe he
5 won't, and then you can come back in and seek whatever
6 relief you deem is appropriate at that time based upon what
7 has occurred.

8 MR. LUCAS: Your Honor, thank you. We
9 understand. And just in concluding, Your Honor, we have
10 asked a lot of the Court over the past several months. A
11 lot has been going on in this case and we know that Your
12 Honor is stepping down from the bench.

13 And so I can't put words in Mr. Sharp's mouth and
14 my partner, Mr. Dulberg's mouth and Mr. Nolan, who's not
15 here, is that we greatly appreciate all of the work and the
16 time that you have accorded to us and, you know, we're just
17 disappointed that we're going to lose somebody who has all
18 of the case history in her head. And so -- but we wish you
19 well and best wishes, Your Honor. Thank you.

20 THE COURT: Thank you, Mr. Lucas. Thank you,
21 Mr. Dulberg. Thank you, Mr. Sharp.

22 MR. DULBERG: Thank you, Your Honor.

23 THE COURT: And thank you, Mr. Olson.

24 So, Mr. Dulberg, you'll upload the orders, as
25 well as Mr. Lucas --

Page 121

1 MR. DULBERG: Yes.
2 THE COURT: -- that the Court has ruled on.
3 MR. DULBERG: Yes.
4 THE COURT: Okay. And --
5 MR. SHARP: Your Honor?
6 THE COURT: -- Mr. Cohen, did you wish to be
7 heard?
8 MR. COHEN: I want to wish you well. I heard --
9 THE COURT: Thank you.
10 MR. COHEN: -- you're retiring. That's all.
11 THE COURT: Thank you. Appreciate it.
12 All right. So that concludes the *Klein* matters.

13 (End at 1:16 p.m.)

14 * * * * *

15 I certify that the foregoing is a correct
16 transcript from the electronic sound recording of the
17 proceedings in the above-entitled matter.

18
19 *Ruth Ann Hager*

20 _____ Date: 3/3/2025

21 RUTH ANN HAGER, C.E.T.**D-641
22
23
24
25

EXHIBIT 2

DECLARATION OF LESLIE KLEIN

I, Leslie Klein, states:

1. I am Debtor herein. My wife, Barbara Klein and I reside in the subject property at 322 North June Street. She is not a co-debtor.
2. I am familiar with properties in the area which were left vacant and became occupied by homeless people and left serious damage diminishing its value. One such example is 315 North Martel Avenue, Los Angeles, California 90036, originally part of this estate, which I estimate lost \$1,000,000 in value. Other properties part of the estate, where Plaintiff took possession and left them vacant and without maintenance that suffered similar losses are in Palm Springs and Oxnard.
3. Attached hereto as Exhibit A is a true and correct copy of the proposed listing agreement.
4. Attached hereto as Exhibit B is a true and correct copy of Plaintiff's First Amended Complaint.
5. Attached hereto as Exhibit C is a true and correct copy of the Motion for Summary Judgment.

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OPPOSITION TO CHAPTER 11 TRUSTEE'S APPLICATION TO (A) EMPLOY COLDWELL BANKER REALTY AS REAL ESTATE BROKER AND (B) ENTER INTO EXCLUSIVE LISTING AGREEMENT

1 6. Attached hereto as Exhibit D is a true and correct copy of the Order
2 regarding Motion for Summary Judgment.
3

4 I declare under penalty of perjury under the laws of the United States
5 that the foregoing is true and correct. Executed this 5th day of March 2025,
6
7 at Los Angeles, California.

8 Dated: March 5, 2025

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11 Leslie Klein
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1 6. Attached hereto as Exhibit D is a true and correct copy of the Order
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3

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5 that the foregoing is true and correct. Executed this 5th day of March 2025,
6
7 at Los Angeles, California.

8 Dated: March 5, 2025
9

10 /s/ Leslie Klein

11 Leslie Klein
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In re: LESLIE KLEIN
Debtor.

Chapter 11
Case No.: 2:23-bk-10990-NB

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 301 East Colorado Boulevard, Suite 520, Pasadena, California 91101.

A true and correct copy of the foregoing document described as “**Opposition to Chapter 11 Trustee’s Motion to Enforce Order to Restore Possession of the Property Located at 322 N. June St., Los Angeles, California**” will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner indicated below:

I. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING

(“NEF”) Pursuant to controlling General Order(s) and Local Bankruptcy Rule(s) (“LBR”), the foregoing document will be served by the court via NEF and hyperlink to the document. On April 4, 2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email address(es) indicated below:

[x] Service information continued on attached page.

II. SERVED BY U.S. MAIL OR OVERNIGHT MAIL (indicated method for each person or entity served): On April 4, 2025, I served the following person(s) and/or entity(ies) at the last known address(es) in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States Mail, first class, postage prepaid, and/or with an overnight mail service addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

[x] Service information continued on attached page.

OPPOSITION TO CHAPTER 11 TRUSTEE’S MOTION SET FOR APRIL 8, 2025 TO ENFORCE ORDER TO RESTORE POSSESSION OF THE PROPERTY LOCATED AT 322 N. JUNE ST., LOS ANGELES, CALIFORNIA

In re: LESLIE KLEIN
Debtor.

Chapter 11
Case No.: 2:23-bk-10990-NB

I declare under penalty of perjury under the laws of the United States of
America that the foregoing is true and correct.

04/04/2025
Date

Jasper Pantaleon
Type Name

/s/ Jasper Pantaleon
Signature

I. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)":

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**OPPOSITION TO CHAPTER 11 TRUSTEE'S MOTION SET FOR APRIL 8, 2025 TO ENFORCE ORDER
TO RESTORE POSSESSION OF THE PROPERTY LOCATED AT 322 N. JUNE ST., LOS ANGELES,
CALIFORNIA**

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II. SERVED BY UNITED STATES MAIL:

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U.S. Bankruptcy Court
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Los Angeles, California 90012

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**OPPOSITION TO CHAPTER 11 TRUSTEE'S MOTION SET FOR APRIL 8, 2025 TO ENFORCE ORDER
TO RESTORE POSSESSION OF THE PROPERTY LOCATED AT 322 N. JUNE ST., LOS ANGELES,
CALIFORNIA**